

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ERB LEGAL INVESTMENTS LLC,	)	
	)	
Plaintiff and Counterclaim Defendant,	)	
	)	
v.	)	
	)	Cause No. 4:20-CV-1255 DDN
QUINTESSA MARKETING LLC,	)	
	)	
	)	
Defendant and Counterclaim Plaintiff.	)	
	)	
	)	
	)	

**MOTION TO COMPEL  
AND CERTIFICATE OF ATTEMPT TO RESOLVE**

**COMES NOW** Plaintiff, ERB LEGAL INVESTMENTS LLC, by and through attorney, E. Ryan Bradley of The Bradley Law Firm and hereby presents to the Court a Motion to Compel and in furtherance thereof states to the Court as follows:

1. Plaintiff served Interrogatories and Requests for Production to Defendant on March 23, 202.
2. Defendant's interrogatory answers and responses to the Requests for Production responses are deficient and assert objections that should be overruled. *See Exhibit 1*-Defendant's Answers and Objections to Plaintiff's Interrogatories; *See Exhibit 2*- Defendant's Responses and Objections to Plaintiff's Requests for Production.
3. On May 18, 2021, Plaintiff's counsel sent a letter to Defendant's counsel outlining the deficiencies of the discovery responses and asked for a reply in writing within

seven (7) days. *See Exhibit 3-* Plaintiff's letter to Counsel. To date, there has been no response thereto.

3. Counsel for Plaintiff attempted to resolve this discovery matter in good faith prior to presenting this matter to the court. On May 20, 2021, defense counsel and the undersigned had a scheduled phone conference to discuss the discovery issues but when the undersigned called defense counsel, he was told that defense counsel was withdrawing as counsel for Quintessa and had no authority to discuss the discovery issues.

4. That the information sought is discoverable and in order to properly prepare for trial, Plaintiff is in need of this information and Plaintiff requires intervention from this Court to compel full and complete answers from Defendant Quintessa.

**WHEREFORE**, Plaintiff prays for this Court to enter an Order compelling Defendant Quintessa to answer without objection all discovery within ten (10) days or for any such other and further relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

By: /s/E. Ryan Bradley

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 27, 2021, I electronically filed the foregoing Certificate of Service with the Clerk of the Court using the Missouri Courts E-Filing System which was sent notification of such filing to all counsel of record. I further certify that I signed, or caused my electronic signature to be placed upon the original of the foregoing documents and that a copy of the foregoing was sent via the Court's e-filing system to.

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/s/E. Ryan Bradley